

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STEAMSHIP INSURANCE MANAGEMENT
SERVICES LIMITED, a foreign limited liability
corporation,

Plaintiff,

v.

OSPREY UNDERWRITING AGENCY
LIMITED, AND ITS CERTAIN
UNDERWRITERS, a foreign unincorporated
entity and/or corporation; and AMERICAN
STEAMSHIP OWNERS MUTUAL
PROTECTION AND INDEMNITY
ASSOCIATION, INC., believed to be a New
York corporation,

Defendants.

Case No.: 15-cv-00043-RSM

DEFENDANT OSPREY
UNDERWRITING AGENCY LTD
DISCLOSURE OF EXPERT
WITNESSES

Pursuant to Federal Rule of Civil Procedure 26(a)(2), and pursuant to the Court's
Scheduling Order, Defendant OSPREY UNDERWRITING AGENCY LIMITED, AND ITS
CERTAIN UNDERWRITERS ("Defendant,") hereby makes the following disclosure of
experts whose testimony may be used at trial under Rules 702, 703, or 705 of the Federal
Rules of Evidence.

DEFENDANT'S DISCLOSURE OF EXPERT WITNESSES - 1

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COZEN O'CONNOR
A PROFESSIONAL CORPORATION
999 THIRD AVENUE
SUITE 1900
SEATTLE, WASHINGTON 98104
(206) 340-1000

I. EXPERT WITNESS DISCLOSURE

A. Retained Experts

1. James W. Pritchett, MD
901 Boren Ave, #900, Seattle WA 98104
12911 120th Ave NE, Suite H-210, Kirkland, WA 98034
206-323-1900

Dr. Pritchett is a board-licensed physician and orthopaedic surgeon. Dr. Pritchett is expected to testify at trial with regard to the underlying 2010 injury allegedly suffered by Mauricio Sanchez, which formed the basis for the underlying action and Shelford's underlying insurance claim, both central to Plaintiff's unjust enrichment claim in this action. Dr. Pritchett's report, curriculum vitae and rate sheet are attached hereto as Exhibit 1. His opinion will be based upon a review of information and documents obtained in discovery from the parties and witnesses and his expertise in orthopaedic injuries and treatment. His hourly rate is \$1200 per hour for deposition (for a minimum of one hour), \$6000 per half day of trial (for a half day minimum; and \$600 per hour for review and/or consulting work.

II. RESERVATION OF RIGHTS

1. Defendant reserves the right to call any witness disclosed by Plaintiff.
2. Defendant reserves the right to supplement this disclosure pursuant to F.R.C.P. 26(a)(2) and to include other witnesses who are revealed during the course of discovery.
3. Discovery and investigation are ongoing in this case, and as of the date of this disclosure the parties have not yet taken any depositions. Defendant reserves the right for Dr. Pritchett to supplement his opinions following review of depositions of the parties and witnesses, further investigation, and disclosure and/or production of other information and documents during discovery.
4. Defendant reserves the right to call any of the above-identified witnesses as rebuttal witnesses and/or supplement this list to include witnesses to rebut or address the testimony of any witness whom Plaintiff subsequently discloses.

DEFENDANT'S DISCLOSURE OF EXPERT WITNESSES - 2

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5. Defendant reserves the right to identify and/or call additional expert witnesses at trial if other issues arise.

6. Defendant reserves the right to elicit expert testimony from lay witnesses.

7. Plaintiff is hereby notified that Defendant intends to call persons with factual knowledge, whether listed as an expert or not, if otherwise disclosed in records provided to you or by you, answers to Interrogatories, or documents you have received or produced in response to Requests for Production. These individuals include Sanchez's treating physicians.

DATED this 2nd day of January, 2017.

COZEN O'CONNOR

By: /s/ Richard F. Allen
Richard F. Allen, WSBA No. 2411
Anusha E. Jones, *Pro Hac Vice*
Jonathan Toren, WSBA No. 46896

999 Third Avenue, ite 1900
Seattle, WA 98104
Telephone: 206.340.1000
Toll Free Phone: 800.423.1950
Facsimile: 206.621.8783

Attorneys for Defendant Osprey Underwriting
Agency Limited, and Its Certain Underwriters

CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2016, I electronically filed the following documents with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

John Edward Duke Powell
Jed Powell & Associates, PLLC
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253-561-8791

jed@jedpowell.com,
aaron@jedpowell.com,
gvolynsky@cairncross.com

Steamship Mutual Underwriting Association Limited

DATED this 2nd day of January, 2017.

COZEN O'CONNOR

By: /s/ Richard F. Allen
Richard F. Allen, WSBA No. 2411

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DEFENDANT'S DISCLOSURE OF EXPERT WITNESSES - 4

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